

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF RHODE ISLAND, et al.,

*Plaintiffs,*

v.

DONALD J. TRUMP, et al.,

*Defendants.*

C.A. No.:

**DECLARATION OF BLAKE DOE**

Pursuant to 28 U.S.C. § 1746, I, Blake Doe, hereby declare as follows:

1. I am currently employed by the Institute of Museum and Library Services (IMLS). I am over the age of 18 and have personal knowledge of all the facts stated herein, except those matters stated upon information and belief; as to those matters, I believe them to be true.

2. I am submitting this declaration pseudonymously because I fear retaliation. But if the Court would like to know my name or job position, I would be willing to provide it ex parte and under seal.

3. I submit this declaration in connection with Executive Order 14,238, “Continuing the Reduction of the Federal Bureaucracy,” which directed seven federal agencies, including the IMLS, to eliminate any non-statutory components and functions to the maximum extent consistent with applicable law, and to reduce the performance of any statutory functions and associated personnel to the minimum presence and function required by law.

4. Prior to issuance of this executive order, approximately 77 employees worked at IMLS.

5. On Friday, March 14, at 8:57 p.m.—hours before the President issued this executive order—Chief of Staff Katherine Maas emailed IMLS staff to state: “We received word from the White House this evening that [IMLS Acting Director] Cyndee [Landrum]’s term as acting director is over. She is returning to the deputy director position, effective immediately, and we have updated the website to reflect this change. At this time, we have no further word about next steps, but stand ready for whatever comes next.”

6. On Monday, March 17, at 11:00 a.m., IMLS leadership held an agency-wide town hall. At this town hall, Laura Huerta Migus, the Deputy Director of the Office of Museum Services, told IMLS staff that the agency would look “very different” following the President’s executive order and that it might be stripped “down to the studs.” Migus told staff to assume that they would be dismissed the following week, if not sooner, and that a Reduction in Force (RIF) plan could be implemented as early as the following week. Migus further advised staff to consider what option was best for them personally, and specifically mentioned that employees could take Voluntary Separation Incentive Payments or Voluntary Early Retirement Authority. Migus told staff that they had a same-day deadline to indicate interest in those options to Human Resources.

7. On Wednesday, March 19, at 2:00 p.m., IMLS leadership held a town hall to announce that Keith E. Sonderling will serve as Acting Director of IMLS, effective the following day. At approximately 3:45 p.m. that day, advanced security personnel arrived to prepare for Sonderling’s visit. After touring the office, they informed staff that Sonderling was expected to arrive around 9:15 a.m. the next morning. One of the security officials remarked that Sonderling would not stay at the agency long, and that IMLS staff would not stay at the agency long, either.

8. At 4:30 p.m. on March 19, IMLS leadership convened an emergency town hall. Migus advised staff to report to the office the next day prepared to collect their personal belongings, as all agency staff would likely be placed on administrative leave that day.

9. On Thursday, March 20, at approximately 9:30 a.m., Keith Sonderling arrived at the IMLS office and was sworn in as Acting Director in the agency lobby. He and his team proceeded to the main conference room for a meeting with IMLS leadership that lasted approximately two hours. Visitors accompanying him included a security detail of two Secret Service agents; Nate Cavanaugh, a member of Department of Government Efficiency (DOGE); a lawyer from the Department of Labor; and Courtney Parella, the Labor Deputy Assistant Secretary for Communications. This team assumed administrative control of IMLS systems, and a few were assigned computers and IMLS email addresses.

10. On Monday, March 31, at 11:30 a.m., four visitors, including Cavanaugh, met with Antoine Dotson, the IMLS Director of Human Resources, and Tom Browder, the IMLS General Counsel, for approximately one hour.

11. At approximately 1:30 pm on Monday, March 31, each office head met separately with their staff to inform them that the entirety of IMLS would be placed on admin leave and that all grants would be terminated, with a potential exception of the Grants to States program. Office Heads indicated that staff should expect that a RIF would be implemented in 30 days or less, and that some staff might be recalled once DOGE determined minimal staffing needed for the agency.

12. Separately, on March 31, I received the following letter by email from Dotson, which placed all IMLS staff on administrative leave and suspended all IMLS email accounts. Staff were ushered out of the building by HR and IT disabled all accounts by end of day:



Acknowledged Receipt: \_\_\_\_\_

Date: \_\_\_\_\_

March 31, 2025

To: ALL IMLS Employees

From: Director of Human Resources

Re: Administrative Leave for IMLS Employees

This is to inform you that you are being placed on administrative leave (i.e., non-duty paid status) starting Monday, March 31, 2025, up to a period of 90-days. You will be on administrative leave with full pay and benefits. This administrative leave is not being done for any disciplinary purpose.

While you are on administrative leave, you are not permitted on IMLS premises. I regret that such directions are necessary, but we must safeguard legitimate IMLS interests and systems. If you wish to enter IMLS premises for official IMLS business, you must first contact me to arrange your visit.

While you are on administrative leave, OHR will handle your time and attendance. Your email will be suspended. You can reach me at my desk number, 202-653-4728, or via email: [adotson@imls.gov](mailto:adotson@imls.gov)

Please understand that this action is not punitive but rather is taken to facilitate the work and operations of the agency. Your pay and benefits will not be affected and will continue during this period.

Please contact me if you have any questions about this letter.

Sincerely,

*Antoine L. Dotson*

Antoine L. Dotson  
Director of Human Resources

13. Consistent with these instructions, I am currently on administrative leave and have no access to IMLS premises or my IMLS email. It is my understanding that all but 12 of my colleagues at IMLS are similarly on administrative leave.

14. It is my understanding that the 12 IMLS employees who are not on administrative leave include one Deputy Director for Museums, one Program Officer for Museums, one Deputy Director for Libraries, one Program Officer for Libraries, the Head of Human Resources and one HR officer, four attorneys, one Chief Financial Officer, and one communications staff member.

15. On April 1, Dotson informed staff through unofficial channels that only 12 employees will be brought back from administrative leave to staff IMLS. The clear implication of

this statement was that all of the remaining employees will be terminated in RIF, possibly within 30 days.

16. Because the remainder of IMLS staff have been placed on administrative leave, IMLS is not currently capable of processing new grant applications or servicing existing grants.

17. Prior to March 31, 30 employees worked in the Office of Museum Services and Office of Library Services, which process and service approximately \$269.5 million in grants per year to libraries and museums in all fifty states, the District of Columbia, five U.S. Territories, and three Freely Associated States. An additional five employees in the Office of Grants Policy and Management assisted with the financial aspects of the grants. Of these 35 employees, 3 program officers, 1 program specialist, and 1 supervisor were responsible for administering the Grants to States Program.

18. These employees were responsible for every aspect of the grant cycle for the hundreds of grants that IMLS awards. These responsibilities include:

- a. Coordinating the submission of hundreds of grants applications under multiple programs;
- b. Coordinating peer review of grant applications;
- c. Awarding grants;
- d. Working with grantees to ensure that they understand compliance with the terms and conditions governing the grants;
- e. Throughout the grant cycle, providing guidance to grantees on technical questions and best practices, as well as periodic requests to draw down the grant funds;
- f. Reviewing interim narrative and financial reports from grantees;

- g. At the end of the grant period, reviewing final financial and narrative reports to ensure completion of the project;
  - h. Putting a completed grant through the closeout process.
19. At any given time, hundreds of awarded grants are at different phases in the grant cycle.
20. Of the 30 employees who processed or administered grant programs and the 5 employees who handled the financial aspects of grants prior to March 31, only 4 are not currently on administrative leave. Only one of the five employees who administering the Grants to States program—the supervisor—is not on administrative leave.
21. Based on my experience, it will not be possible for a staff of 12 employees to complete this workload. The 12 employees that are expected to be brought back from administrative leave will not be able to administer the volume of existing grants and incoming grant applications for the upcoming year. As a result, I expect that no new grants will be awarded, and most existing grants will be terminated.
22. In addition, none of the 12 employees who will be brought back from administrative leave works in the Office of Research and Evaluation. As a result, this office will effectively no longer exist at the agency. This indicates that the Public Library Survey, which is conducted every two years and is essential to understanding the library field, will cease to be issued. Additional program evaluations and data collection will also cease.
23. I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct. Executed on April 3, 2025.

\_\_\_\_\_  
/s/ Blake Doe  
Blake Doe